

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**AHKIL NASIR CRUMPTON**

**Case No.: 3:22-CR-012-TES-CHW**

---

---

**MR. CRUMPTON'S AMENDED PROPOSED VOIR DIRE QUESTIONS**

COMES NOW the Defendant, Ahkil Crumpton, by and through undersigned counsel, propounds the following questions:

**Background:**

1. Do you, or any members of your family or friends know the Assistant United States Attorney, Mike Morrison or Daniel Peach who will be prosecuting this case? If so, how do you know them?
2. Do you, or any members of your family or friends know the presiding Judge in this case, the Honorable Tillman "Tripp" Self? If so, how do you know him?
3. Do you know or recognize any other prospective jury panelist in the courtroom? If so, what is the basis of the relationship? Would such a relationship or acquaintance influence your judgment in the case?
4. Do you know any of the following potential witnesses? (List potential witnesses).

**Bias:**

5. Have any of you or anyone you know ever been a witness or informant for the government?
6. Have any of you had a family member that has ever been accused of a crime?

7. Would you consider the race of Mr. Akhil Crumpton in your evaluation of this case? How would it affect you?
8. The evidence in this case will involve a black defendant and a white store clerk does anyone believe that race would play a role in how they decide this case?

**Presumption of Innocence, Beyond a Reasonable Doubt**

9. The law requires that Mr. Crumpton is presumed innocent and remains innocent unless the government proves his guilt beyond a reasonable doubt. Does anyone think the law should not be that way? Why do you think that?
10. Does anyone believe that a person facing imprisonment should have to prove himself innocent?
11. In the law, there are three common burdens of proof of which you may have heard: preponderance of evidence, clear and convincing evidence, and beyond a reasonable doubt. Preponderance of evidence means more likely than not. It is the burden which a plaintiff seeking money damages in a civil action must prove. Clear and convincing evidence is greater than that. Beyond a reasonable doubt is a still greater burden. Does anyone believe that the government should be able to convict and imprison a person based upon proof where there is reasonable doubt? Why?
12. The law requires the government to prove every element of their case beyond a reasonable doubt. Do any of you have a problem returning a verdict of not guilty if only one element is not proven beyond a reasonable doubt?
13. Do each of you agree with the law which presumes that the defendant is innocent as he sits in this courtroom today and until such time as the government proves its case beyond a reasonable doubt?

**Defendant Testimony:**

14. Mr. Crumpton has already pled not guilty to these charges. How many of you feel like you need to hear his side of the story in order to decide his guilt or innocence?
15. Does anyone believe that the Defendant has to prove his innocence or put up evidence in his behalf in order to be found not guilty?
16. Would you require in your own mind that the Defendant prove his innocence to you before you would find him Not Guilty?
17. Would you hold it against him if he did not testify?
18. Do you agree with the fact that the law does not require him to testify?

**Law Enforcement - Legal Training:**

19. Have you ever applied for a job with or worked for a law enforcement agency, or in the security field? By law enforcement agency, I mean organizations such as the Police Department, Sheriff's Department, F.B.I., the District Attorney's Office, United States Attorney's Office, C.I.A., I.R.S., Secret Service, Military Police, U.S. Customs Office, Department of Homeland Security, Immigrations Custom and Enforcement Officers, or private security firms.
20. Do you have any relatives or friends that work or have worked in law enforcement?
21. Do you have any relative or friends that are federal employees?
22. Have any of you (or close friends or family) worked for any prison, jail, department of corrections, bureau of prisons, probation office or parole agency?
23. Have any of you (or close friends or relatives) ever worked for either a state or federal court system in any capacity?

24. Would any of you tend to give any greater weight or credibility, no matter how slight, to the testimony of a federal agent, state agent, or prosecution witness because they are employees of, or are testifying on behalf of the government?
25. Would you automatically give their testimony greater weight or credibility over that of a defense witness?
26. Does anyone on the panel have any legal training, either law school, or legal or criminal justice courses?
27. Anyone on the panel ever worked in a legal office?
28. Has anyone ever testified in any sort of legal proceeding? Trial, hearing, deposition or the like?

**Expert Testimony:**

29. Does anyone here have prior experience with an expert giving their opinion on a matter within their expertise? If so, please describe that experience.
30. Does anyone here have a strong opinion on the concept of expert testimony in a jury trial? If so, please tell us what that is.
31. Does anyone here think that if an expert testifies and gives their opinion on an issue, that the jury has to accept what the expert says as the only opinion that matters?

**Cellular Telephone Communications:**

32. Does anyone here have training, professional experience or expertise in how cellular telephone communication takes place? If so, please describe that training, experience, or expertise for us.

### **Self-Defense**

We believe this case will include evidence of a separate event where a person used a handgun to defend themselves against and Armed Robber:

33. Has anyone themselves, or a close family member, had to defend themselves against an attacker? If so, please tell us about that incident.
34. Does anyone here have any strong opinions on the right of self-defense? If so:
  - a. Do you believe in “Stand Your Ground” laws?

### **Knowledge of the Events**

35. The indictment in this case involves charges involving an alleged attempted robbery of the RaceTrac gas station located at 7921 Macon Highway in Watkinsville, GA on March 19, 2021.
  - a. Has anyone heard about that event? If so, how?
  - b. Does anyone know any person or persons involved in or connected to that event?

### **University of Georgia:**

We believe there will be evidence that Mr. Crumpton played football for the University of Georgia:

36. Does anyone here attend UGA football games? If so:
  - a. Do you have season tickets? If so, how long have you had them?
37. Now knowing that Mr. Crumpton played football for Georgia, does anyone recognize him or his name?
38. Has anyone themselves, or have family members who, now or in the past have worked for the University of Georgia?
39. Has anyone themselves, or have family members who, now or in the past have had any formal relationship with the University of Georgia Football program?

40. Does anyone have particularly strong feelings about the University of Georgia football program?

**Firearms:**

41. Do you or anyone in your family own any firearm? If so, how many and what type (handgun, rifle, shotgun, etc.)?
42. Have you yourself ever purchased or sold a firearm, or been involved in the purchase or sale of a firearm? If so, was the sale/purchase made through a registered firearm dealer or through a private person to person transaction?
43. Do you have personal experience with firearms such that you know the differences between types and calibers of firearms? If so:
- a. What is your level of experience?
  - b. What is your interest in firearms?
44. Do you have personal experience firing handguns? If so, please tell us your level of experience.
45. Do you have strong feelings about gun ownership, gun registration or gun control?
46. Has news coverage about crime affected your opinions about firearms? If so, in what way has your opinion been affected?
47. Do you believe we need to change the gun laws we currently have in place? If so, please tell us if you think the current law is too restrictive or not restrictive enough.

**Victim of Crime:**

48. Have you or anyone in your family ever been the victim of a crime? If so, what was that crime?

**Urban Crime:**

49. Does anyone here have strong opinions or thoughts about big-city crime? If so, please tell us about those thoughts or opinions.

**Miscellaneous:**

50. Has anyone had a recent death in the family, or of someone close to you?
51. Is there any information you believe the court, or the parties should know about you, in order to allow the parties to choose the fairest jury for this case?

Dated this 6<sup>th</sup> day of October 2023.

**/s/Timothy R. Saviello**

Timothy R. Saviello

Ga. Bar No. 627820

Attorney for Defendant

Federal Defenders of the

Middle District of Georgia, Inc.

440 Martin Luther King Jr. Blvd.

Suite 400

Macon, GA 31201

Tel: (478) 743-4747

Fax: (478) 207-3419

Email: [tim\\_saviello@fd.org](mailto:tim_saviello@fd.org)

**/s/Chauntilia K. Adaway**

Chauntilia K. Adaway

Assistant Federal Defender

Ga. Bar No. 871398

Federal Defenders of the

Middle District of Georgia, Inc.

440 Martin Luther King Jr. Blvd.

Suite 400

Macon, GA 31201

Tel: (478) 743-4747

Fax: (478) 207-3419

Email: [chauntilia\\_adaway@fd.org](mailto:chauntilia_adaway@fd.org)

**CERTIFICATE OF SERVICE**

I, Timothy R. Saviello, hereby certify that, I electronically filed the foregoing with the clerk of Court using the CM/ECF system which will send notification of such to all counsel of record.

**/s/Timothy R. Saviello**

Timothy R. Saviello

Ga. Bar No. 627820

Attorney for Defendant

Federal Defenders of the

Middle District of Georgia, Inc.

440 Martin Luther King Jr. Blvd.

Suite 400

Macon, GA 31201

Tel: (478) 743-4747

Fax: (478) 207-3419

Email: [tim\\_saviello@fd.org](mailto:tim_saviello@fd.org)